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8
9 **UNITED STATES DISTRICT COURT**

10 **CENTRAL DISTRICT OF CALIFORNIA**

11 CASCADES PROJECTION LLC,

12 Plaintiff,

13 vs.

14 EPSON AMERICA, INC. and EPSON
ELECTRONICS AMERICA, INC.,

15 Defendants.
16

Case No. 2:15-CV-00258

**COMPLAINT FOR PATENT
INFRINGEMENT**

DEMAND FOR JURY TRIAL

17 Plaintiff Cascades Projection LLC (“Cascades”), by its undersigned attorney,
18 for its complaint against defendants Epson America, Inc. and Epson Electronics
19 America, Inc. (collectively, “Epson”), hereby alleges as follows:

20 1. This is an action for patent infringement arising under the patent laws
21 of the United States, Title 35 of the United States Code.

22 **PARTIES**

23 2. Plaintiff Cascades is an Illinois limited liability company having its
24 principal place of business at 500 Skokie Boulevard, Suite 250, Northbrook, IL
25 60062. Cascades is the exclusive licensee and holder of all substantial rights to
26 U.S. Patent Number 7,688,347 (“the ‘347 patent”).

27 3. Defendant Epson America, Inc. is a corporation organized and existing
28 under the laws of California, with its principal place of business located in Long

1 Beach, California. Epson America transacts substantial business, either directly or
2 through its agents, on an ongoing basis in this judicial district and elsewhere in the
3 United States.

4 4. Defendant Epson Electronics America, Inc. is a corporation organized
5 and existing under the laws of California, with its principal place of business
6 located in San Jose, California. Epson Electronics America transacts substantial
7 business, either directly or through its agents, on an ongoing basis in this judicial
8 district and elsewhere in the United States.

9 **JURISDICTION AND VENUE**

10 5. This complaint states claims arising under the patent laws of the United
11 States. Plaintiff Cascades asserts causes of action under 35 U.S.C. § 271 for
12 infringement of its patent. This Court has original and exclusive subject matter
13 jurisdiction over this claim pursuant to 28 U.S.C. §§ 1331 and 1338(a).

14 6. This Court has personal jurisdiction over the defendants pursuant to
15 Fed. R. Civ. P. 4(k)(1)(A) and California's long arm statute, Cal. Code Civ. P. §
16 410.10.

17 7. Venue is proper in this District pursuant to 28 U.S.C. §§ 1391 and
18 1400(b).

19 **BACKGROUND**

20 8. Eugene Dolgoff is an instrumental figure in the development of
21 holography and video projection systems. In 1971, Dolgoff invented a technique
22 for holographic transfer printing—a technique still used on credit cards today.
23 Throughout the 1970s and 1980s, Dolgoff consulted for industry and the military
24 and developed three-dimensional X-rays, CAT-scan, ultrasound, and MRI
25 technologies. In 1984, Dolgoff built the world's first single-panel LCD digital
26 video projector. Dolgoff's work led to him being selected as a member of the
27 American Electronics Association High-Definition TV Task Force and the National
28 Association of Photographic Manufacturers Standards Subcommittee IT 7-3, which

1 defined the standards for fixed resolution electronic projectors.

2 9. Among his innovations, Dolgoff developed several techniques to
3 increase the efficiency of light use in digital projection systems. Early projection
4 systems used light inefficiently, causing significant amounts of light from a
5 projector's lamp to be wasted. The result was a dim image, difficult to see without
6 turning off any other light sources in the room. Furthermore, early projection
7 systems did not use light uniformly across the image—causing the image to be dim
8 around its outer edge. Nor did they attempt to evenly disperse the color of the light
9 emanating from its light source.

10 10. Dolgoff developed several optical techniques to increase the efficiency
11 of light use, and the uniformity of brightness and color, in digital projection
12 systems.

13 11. Dolgoff's research led to the issuance of United States Patent No.
14 7,688,347. The '347 patent was duly and legally issued on March 30, 2010 for an
15 invention entitled "High-Efficiency Display System Utilizing an Optical Element to
16 Reshape Light with Color and Brightness Uniformity." A true and correct copy of
17 the '347 patent is attached hereto as Exhibit A.

18 12. Dolgoff is the sole owner of the '347 patent.

19 13. On September 19, 2014, Dolgoff executed an Exclusive License
20 Agreement with Cascades. The Exclusive License Agreement granted Cascades a
21 non-revocable exclusive license with all substantial rights in the '347 patent, in
22 consideration for which, among other things, Dolgoff is entitled to receive a
23 percentage of the licensing revenues.

24 **COUNT 1 – INFRINGEMENT OF U.S. PATENT NO. 7,688,347**

25 14. Epson has infringed and continues to infringe one or more claims of the
26 '347 patent by its manufacture, use, sale, importation, and/or offer for sale of
27 certain digital projector systems, including but not limited to Epson's EX3220
28 projector. Epson is liable for its infringement of the '347 patent pursuant to 35

1 U.S.C. § 271.

2 **PRAYER FOR RELIEF**

3 WHEREFORE, Plaintiff Cascades requests entry of judgment in its favor and
4 against Epson as follows:

5 a. Declaring that Epson has infringed U.S. Patent No. 7,688,347;

6 b. Awarding the damages arising out of Epson's infringement of U.S.
7 Patent No. 7,688,347 to Cascades, together with prejudgment and post-judgment
8 interest, in an amount according to proof;

9 c. Awarding attorneys' fees pursuant to 35 U.S.C. § 285 or as otherwise
10 permitted by law; and

11 d. Awarding such other costs and further relief as the Court may deem
12 just and proper.

1 Dated: January 13, 2015

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21 PROJECTION LLC
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JURY DEMAND

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Cascades respectfully requests a trial by jury on all issues.

Dated: January 13, 2015

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